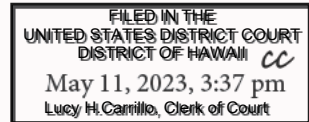


CLARE E. CONNORS #7936  
United States Attorney  
District of Hawaii



REBECCA A. PERLMUTTER  
Assistant United States Attorneys  
Room 6-100, PJKK Federal Building  
300 Ala Moana Boulevard  
Honolulu, Hawaii 96850  
Telephone: (808) 541-2850  
Fax: (808) 541-2958  
Email: Rebecca.Perlmutter@usdoj.gov

Attorneys for Plaintiff  
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,	)	CR. NO. 23-00041 SOM
	)	
Plaintiff,	)	INFORMATION
	)	
vs.	)	[18 U.S.C. § 2251(a)]
	)	
ALDEN BUNAG,	)	
	)	
Defendant.	)	
	)	

INFORMATION

The U.S. Attorney charges:

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Production of Child Pornography  
(18 U.S.C. § 2251(a))

From in or around 2017 through 2018, within the District of Hawaii and elsewhere, ALDEN BUNAG, the defendant, did attempt to and did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that any such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting such commerce, and where any visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and where any such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting such commerce.

All in violation of Title 18, United States Code, Section 2251(a).

FORFEITURE NOTICE

1. The allegations in this Information are incorporated here for the purpose of noticing forfeitures pursuant to Title 18, United States Code, Section 2253.

2. The United States hereby gives notice to ALDEN BUNAG, the defendant, that, upon conviction of an offense in violation of Title 18, United States Code, Section 2251, the United States will seek forfeiture, in accordance with Title

18, United States Code, Section 2253, of (a) any visual depiction described in Title 18, United States Code, Section 2252, and any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of that section; (b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and (c) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

3. If by any act or omission of the defendant, any of the property subject to forfeiture described in paragraph 2 herein:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

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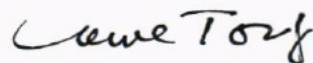
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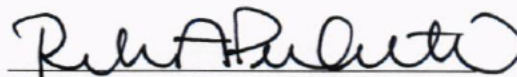
e. has been commingled with other property which cannot be subdivided without difficulty, the United States will be entitled to forfeiture of substitute property up to the value of the property described above in paragraph 2, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253.

DATED: May 11, 2023, at Honolulu, Hawaii.



For

CLARE E. CONNORS  
United States Attorney  
District of Hawaii



REBECCA A. PERLMUTTER  
Assistant U.S. Attorney